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16 *Attorneys for Defendants Tesla, Inc., Elon Musk,*

17 *Brad W. Buss, Robyn Denholm, Ira Ehrenpreis,*

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19 *and Linda Johnson Rice*

20 UNITED STATES DISTRICT COURT

21 NORTHERN DISTRICT OF CALIFORNIA

22 IN RE TESLA, INC. SECURITIES  
23 LITIGATION

24 Case No. 3:18-cv-04865-EMC

25 **JOINT STATUS REPORT**

Consistent with the Court's Order (ECF No. 348), the parties respectfully submit this Joint Status Report in advance of the March 8, 2022 Status Conference before the Court. The parties are in the process of completing expert depositions and anticipate finishing such depositions in March. The parties are also in the process of conducting meet-and-confer conferences in accordance with Magistrate Judge Westmore's practice rules concerning (1) challenges to Defendants' confidentiality designations under the Stipulated Protective Order (ECF No. 255), (2) disputes over whether Defendants properly asserted privilege when withholding certain categories of documents from production in the course of discovery, and (3) disputes over alleged deficiencies in Plaintiff's interrogatory responses.

The parties are meanwhile preparing to appear before the Court on March 10 for the hearing on Plaintiff's motion for partial summary judgment, which we understand will be conducted remotely via Zoom.

Finally, the parties are in the process of preparing the pretrial disclosures due in April, including motions in limine, a jury statement and instructions, voir dire questions, exhibits, verdict form, etc., and are prepared to begin trial on May 31, 2022.

Respectfully submitted,

DATED: March 1, 2022

QUINN EMANUEL URQUHART & SULLIVAN, LLP

By: /s/ Alex Spiro

Alex Spiro (*appearing pro hac vice*)  
Attorneys for Tesla, Inc., Elon Musk, Brad W. Buss,  
Robyn Denholm, Ira Ehrenpreis, Antonio J. Gracias,  
James Murdoch, Kimbal Musk, and Linda Johnson Rice

DATED: March 1, 2022

LEVI & KORSINSKY, LLP

By: /s/ Nicholas I. Porritt

Nicholas I. Porritt (*appearing pro hac vice*)  
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Counsel for the Class

**ATTESTATION**

I, Kyle K. Batter, am the ECF user whose ID and password are being used to file the above document. In compliance with Local Rule 5-1(h)(3), I hereby attest that Alex Spiro and Nicholas Porritt have concurred in the filing of the above document.

/s/ Kyle K. Batter

Kyle K. Batter